

40. According to a comparison of estimated population between the two WWPD(FM) projected population coverages, the Latta proposal will exclude 627 persons in the Danwood Division; 7,694 persons in the Pamplico Division; 1,314 in the Town of Pamplico; 1,153 persons in the Centenary Division; and 7,267 persons in the Marion Division. Ranke finds the loss area's 18,055 persons to be highly significant -- some 23.5% of WWPD(FM)'s projected current service of 76,966 (see Exhibit B). Ranke's population estimates were calculated using Dataworld, Inc.'s *PopCount* program. *PopCount* utilizes 1990 Census data for each Minor Civil Division ("MCD") within a specified contour study area. Uniform population distribution is assumed within each MCD, when a portion of that MCD falls within the study area.

41. Winfas admits that by its own calculations some 11,844 persons would be included in this area. Evidently Winfas and its technical consultant do not believe 11,844 persons to be significant (according to its own numbers, this amounts to 16.6% of WWPD(FM)'s existing population coverage).

42. Winfas' technical consultant appears to have conveniently ignored these persons in the remainder of his calculations. He indicates an increase in coverage of 131,815 additional persons. The fact that Latta's projected coverage does not completely encompass the existing coverage at Marion must be taken into account. Winfas' technical consultant evidently only considered the gain area, with no regard to the loss area. In making such a population study, it is not simply the total number of new persons served, but the net number of new persons served (the gain area

minus the loss area). Subtracting the 11,844 persons in the loss area from the 131,815 persons in the gain area leaves the actual number necessary for the purposes of this discussion: net gain = 119,971. The quickest method would have been to subtract current service from projected service -- the resulting figure would have been the same ($191,322 - 71,351 = 119,971$ net gain).¹³

43. According to figures projected by Ranke's technical consultant, the proposed WWP(DFM) at Latta covers 183,025 total persons (1990), while the existing WWP(DFM) at Marion covers 76,966 total persons (1990), a gain area of 124,114 persons, and net increase in coverage of 106,059 persons (see Exhibits A and B).

44. Meanwhile, utilizing the same standardized process yields a total population coverage estimate for Ranke's counterproposal at Blythewood of 386,910 persons (1990) (see Exhibit C). Ranke's counterproposal, when considered under the same criteria as Winfas' proposal is vastly superior, and should be favored.

45. Ranke again affirms unequivocally that if the proposed allotment of Channel 232A to Blythewood, South Carolina is made, he will tender an application for construction permit for the New

¹³ The net gain is the critical comparative factor. For a proposal which has a 1.0 mV/m radius which completely encompasses the existing 1.0 mV/m radius, the net gain and the "gain area" are the same. However in the case where the two proposals are completely disparate, taking the "gain area" by itself, without consideration for any "loss area" would lead to an erroneous assumption. Therefore net gain must ("gain area" minus "loss area") be considered as the significant number.

FM, and if granted a construction permit, will build the facility promptly.

Conclusion

Wherefore, in light of the foregoing, Ranke's counterproposal is in the public interest, and in fact should be preferred over Winfas' proposed upgrade and change in city of license for WWPD(FM). The Commission should act in favor of the counterproposal, allot Channel 232A to Blythewood, South Carolina, and concurrently modify the authorization of WPUB-FM, Camden, South Carolina, to specify operation on Channel 274A, and DENY Winfas' proposed upgrade of WWPD(FM).

Respectfully submitted,

By Joseph Adams Ranke
Joseph Adams Ranke

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June 12, 1993

ASSOCIATED RADIO RESOURCES, INC
CHARLESTON, SC

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Population count based on 1990 Census

Title: WWP(D(FM) proposed

Coordinates: 34-25-33 79-29-57

60 dBu
(1.0 mV/m)

Robeson County, North Carolina

Alfordsville township	1,743
r/o Back Swamp township	1,137
Fairmont town	2,489
r/o Fairmont township	2,757
Gaddy township	1,009
Marietta town	206
r/o Marietta township	919
Maxton town	2,164
r/o Maxton township	2,169
McDonald town	88
r/o Orrum township	66
Pembroke town	132
r/o Pembroke township	2,940
Raynham town	106
Rowland town	1,139
r/o Rowland township	1,500
Smiths township	73
Sterlings township	454
r/o Thompson township	912
r/o Union township	2,153
Totals for Robeson County (1990 Census):	24,156

Scotland County, North Carolina

Gibson town	273
Laurinburg city	5,828
Maxton town	164
r/o Stewartsville township	6,267
r/o Williamson township	2,118
Totals for Scotland County (1990 Census):	14,650

Totals for North Carolina (1990 Census): 38,806

JOSEPH ADAMS RANKE

Exhibit A

ASSOCIATED RADIO RESOURCES, INC
CHARLESTON, SC

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CONFIDENTIAL - 1000

ASSOCIATED RADIO RESOURCES, INC
CHARLESTON, SC

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Population count based on 1990 Census

Title: WWPD(FM) proposed

Coordinates: 34-25-33 79-29-57

60 dBu
(1.0 mV/m)

Marlboro County, South Carolina

r/o Clio division	1,983
McColl town	2,685
r/o McColl division	2,356
Tatum town	49
Wallace division	310
Totals for Marlboro County (1990 Census):	25,713
Totals for South Carolina (1990 Census):	144,219
Total Population (1990 Census):	183,025
Area (Square km):	4632.5

ASSOCIATED RADIO RESOURCES, INC
CHARLESTON, SC

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Population count based on 1990 Census

Title: WWPD(FM) current

Coordinates: 34-11-14 79-31-23

60 dBu
(1.0 mV/m)

Darlington County, South Carolina

r/o Darlington division	541
Totals for Darlington County (1990 Census):	541

Dillon County, South Carolina

r/o Dillon division	3
r/o Lake View division	55
r/o Latta division	4,451
Latta town	1,565
Totals for Dillon County (1990 Census):	6,074

Florence County, South Carolina

r/o Danwood division	627
Florence city	21,355
r/o Florence division	14,603
Pamplico town	1,314
r/o Pamplico division	9,661
Quinby town	865
Totals for Florence County (1990 Census):	48,425

Marion County, South Carolina

Centenary division	1,235
Marion city	7,658
r/o Marion division	8,770
Mullins city	952
r/o Mullins division	2,851
Sellers town	358
Totals for Marion County (1990 Census):	21,824

Marlboro County, South Carolina

r/o Blenheim division	102
Totals for Marlboro County (1990 Census):	102

Totals for South Carolina (1990 Census):	76,966
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Total Population (1990 Census):	76,966
Area (Square km):	1839.8

JOSEPH ADAMS RANKE

Exhibit C

ASSOCIATED RADIO RESOURCES, INC
CHARLESTON, SC

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Population count based on 1990 Census

Title: BLYTHEWOOD proposed

Coordinates: 34-05-30 80-55-30

60 dBu
(1.0 mV/m)

Calhoun County, South Carolina

Sandy Run-Staley division	23
Totals for Calhoun County (1990 Census):	23

Fairfield County, South Carolina

Ridgeway town	407
r/o Ridgeway division	3,003
r/o Ridgeway South division	1,251

ASSOCIATED RADIO RESOURCES, INC
CHARLESTON, SC

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Population count based on 1990 Census

Title: BLYTHEWOOD proposed

Coordinates: 34-05-30 80-55-30

60 dBu
(1.0 mV/m)

Richland County, South Carolina

r/o Eastover division	1,910
Forest Acres city	7,197
Hopkins division	4,882
r/o Horrell Hill division	10,309
Irmo town	7,200
r/o Pontiac division	23,933
St. Andrews CDP	25,692
Valencia Heights CDP	4,122
Woodfield CDP	8,862
Totals for Richland County (1990 Census):	276,070
Totals for South Carolina (1990 Census):	386,910
Total Population (1990 Census):	386,910
Area (Square km):	2516.1

CERTIFICATE OF SERVICE

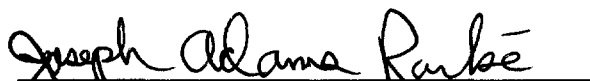
I, Joseph Adams Ranke, do hereby certify that on this 12th day of June, 1993, I have caused to be mailed, via first class mail, postage prepaid, a copy of the foregoing "Comments and Counterproposal" to the following:

Gary S. Smithwick, Esquire
SMITHWICK & BELENDIUK, P.C.
1990 M Street, NW - Suite 510
Washington, DC 20036

Counsel to Winfas of Belhaven, Inc.

Kershaw Radio Corporation
Post Office Box 753
Camden, SC 29020

Licensee of WPUB-FM



Joseph Adams Ranke

June 12, 1993